

KAZEROUNI LAW GROUP, APC

Abbas Kazerounian, Esq. (SBN: 249203)
ak@kazlg.com
Matthew M. Loker, Esq. (SBN: 279939)
ml@kazlg.com
245 Fischer Avenue, Unit D1
Costa Mesa, CA 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

**LAW OFFICES OF DARRELL
PALMER PC**

Joseph Darrell Palmer, Esq. (125147)
darrell.palmer@palmerlegalteam.com
2244 Faraday Avenue, Suite 121
Carlsbad, CA 92008
Telephone: (858) 215-4064
Facsimile: (866) 583-8115

Attorney for Objector,
Susan House

HYDE & SWIGART

Joshua B. Swigart, Esq. (SBN: 225557)
josh@westcoastlitigation.com
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

Attorneys for Plaintiff,
Schuyler Hoffman

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**SCHUYLER HOFFMAN,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,**

Plaintiff,

v.

BANK OF AMERICA, N.A.,

Defendant.

Case No.: 3:12-cv-539 JAH (DHB)

**JOINT STIPULATION
WITHDRAWING OBJECTOR
SUSAN HOUSE'S OBJECTION TO
PLAINTIFF'S MOTION FOR FINAL
APPROVAL AND MOTION FOR
ATTORNEYS' FEES**

HON. JOHN A. HOUSTON

///

///

1 WHEREAS, this Court preliminarily approved Plaintiff SCHUYLER
2 HOFFMAN (“Hoffman”) and Defendant BANK OF AMERICA, N.A.’s (“BofA”)
3 class settlement on February 13, 2014. [ECF No. 48];

4 WHEREAS, Objector SUSAN HOUSE (“House”) lodged an objection to the
5 Parties class settlement on August 21, 2014. [ECF No. 55];

6 WHEREAS, Hoffman and BofA moved for Final Approval of the class
7 settlement on August 25, 2014. [ECF No. 56];

8 WHEREAS, House lodged an Opposition to the Parties’ Final Approval
9 Motion on September 10, 2014. [ECF No. 58];

10 WHEREAS, Class counsel met and conferred with House and House’s
11 counsel before Judge Hoffman (Ret.) to discuss the issues addressed in House’s
12 Opposition;

13 WHEREAS, Class counsel agreed to extend the Claims period and post all
14 motions for approval and fees on the settlement website upon Court approval;

15 WHEREAS, Class counsel established that no conflict of interest exists in this
16 matter and after such meet and confer, House is fully satisfied that no such conflict
17 exists, specifically as it relates to any of her objections;

18 WHEREAS, House believes that the issues addressed in House’s Objection
19 are now remedied;

20 WHEREAS, Class counsel agree that extending the claims period to October
21 21, 2014 and any claims up to that date will be deemed as timely claims with Court
22 Approval, and posting the fee and approval motions on the settlement website have
23 benefited the class; and,

24 WHEREAS, House now agrees to withdraw all House’s Objections to the
25 Parties class settlement.

26 IT IS HEREBY STIPULATED by and between the Parties, through their
27 respective counsel of record, that:

28 1. All of House’s Objections to the class settlement (ECF No. 55) are hereby

1 withdrawn;

2 2. The claims period be extended until October 21, 2014 upon Court
3 approval; and,

4 3. House's Opposition to the class settlement (ECF No. 58) is hereby
5 withdrawn;

6 4. Any additional costs related to the upkeep of the website and
7 administrative costs for the extended claims period shall come from the
8 Settlement Fund; and

9 5. House, Hoffman and Bank of America respectfully request this Court
10 finally approve the Parties' class settlement.

11
12
13
14
15 Dated: September 26, 2014

Respectfully submitted,

16
17 **KAZEROUNI LAW GROUP, APC**

18
19 By: /s/ Abbas Kazerounian
20 ABBAS KAZEROUNIAN, ESQ.
21 ATTORNEY FOR PLAINTIFF

22 **REED SMITH LLP**

23 By: /s/ Felicia Yu
24 FELICIA YU, ESQ.
25 ATTORNEY FOR DEFENDANT

26 **LAW OFFICES OF DARRELL PALMER PC**

27 By: /s/ Joseph Darrell Palmer
28 JOSEPH DARRELL PALMER, ESQ.
ATTORNEY FOR OBJECTOR

1 IT IS THE RECOMMENDATION OF HONORABLE HERBERT B. HOFFMAN (RET.)
2 THAT THIS JOINT STIPULATION BE APPROVED BY THIS HONORABLE COURT

3 JUDICATE WEST

4
5 By: 
6 HONORABLE HERBERT B. HOFFMAN (RET.)

7
8 **SIGNATURE CERTIFICATION**

9 Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies
10 and Procedures Manual, I hereby certify that the content of this document is
11 acceptable to Joseph Darrell Palmer, Esq.; and, Felicia Yu, Esq. and that I have
12 obtained Mr. Palmer; and, Ms. Yu's authorization to affix their electronic
13 signatures to this document.

14 Dated: September 26, 2014

KAZEROUNI LAW GROUP, APC

15
16 By: /s/ Abbas Kazerounian
17 ABBAS KAZEROUNIAN, ESQ.
18 ATTORNEY FOR PLAINTIFF
19
20
21
22
23
24
25
26
27
28